



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

75 Hawthorne Street
San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

July 15, 2011

Ken Riesz, Plant Manager
El Segundo Power, LLC
301 Vista Del Mar Boulevard
El Segundo, CA 90245

George Piantka, P.E., Director Environmental
NRG Energy, West
5790 Fleet Street, Suite 200
Carlsbad, CA 92008

Re: Polychlorinated Biphenyls (PCBs) Under Toxic Substances Control Act – USEPA Conditional Approval Under 40 CFR 761.61(c) of “Proposed Change to Cleanup”, Former Units 1&2 Powerblock Foundation, El Segundo Generating Station, El Segundo, California

Dear Mr. Riesz and Mr. Piantka:

We have reviewed the attached AECOM letter dated June 29, 2011 (Subject: “...Proposed Change to Cleanup”) notifying the U.S. Environmental Protection Agency (USEPA) of contamination by polychlorinated biphenyls (PCBs) discovered in concrete foundations below ground surface, soils at a depth of 10 to 18 feet below ground surface, and in ground water. This discovery was made during soil cleanup and cleanup verification sampling in the southwest portion of the El Segundo Generating Station (ESGS) Site in accordance with the PCB Notification that we approved with conditions on April 1, 2011. On behalf of NRG and El Segundo Power, LLC (ESP), AECOM’s letter proposes changes to the PCB cleanup plan included in the approved Notification.

This letter approves the proposed changes to the Notification with the conditions and modifications established below. This approval excludes issues related to the finding of PCBs in ground water at the Site and USEPA will address those issues in a separate letter within the next two weeks.

ESP’s Proposed Changes to the March 2, 2011 PCB Notification – USEPA Conditions of Approval

USEPA approved ESP’s PCB Notification on April 1, 2011 with conditions under 40 CFR 761.61(a) and (c). USEPA is approving AECON’s proposed changes to the Notification with the conditions established below. This letter also modifies USEPA’s April 1, 2011 approval of the ESP PCB Notification. USEPA is open to discussing the conditions below with NRG, ESP, and AECOM.

- 1. PCB cleanup level for soils.** For the areas in the southwest portion of the Site where PCB-contaminated soils were detected at depths of 10 to 18 feet below ground surface (bgs), USEPA is requiring a cleanup level of less than or equal to 0.3 mg/kg for PCB contaminated soils impacting ground water in the southwest portion of the Site. Based on AECOM’s preliminary analytical data, PCBs were detected in soils at depth at concentrations ranging from 0.006 mg/kg to 3,760 mg/kg.
- 2. Dewatering of excavated soils.** After excavated, soils will be dewatered in dewatering bins before sending to offsite disposal. The concentration of PCBs in soils to determine offsite disposal must be the in-situ PCB concentration in the soils before excavation. The PCB analytical results for soils must be corrected for percent moisture. Dewatered soils with PCB concentrations equal to or above 50 mg/kg must be disposed in

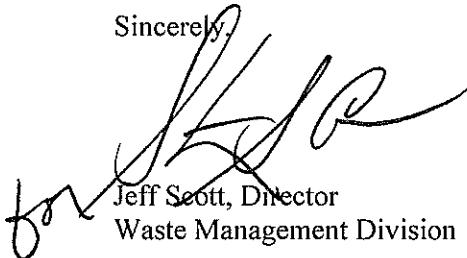
USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c)
AECOM / NRG / ESP Proposed Changes to March 2, 2011 PCB Notification
El Segundo Generating Station, El Segundo, California
Date: July 15, 2011

accordance with 40 CFR 761.61(a)(5)(i)(B), (B)(2)(iii), and (B)(2)(iv). Soils with PCB concentrations below 50 mg/kg must be disposed offsite in accordance with 40 CFR 761.61(a)(5)(i)(B), (B)(2)(ii), and (B)(2)(iv). Water from soils that are being dewatered for offsite disposal must be disposed offsite in accordance with 40 CFR 761.61(a)(5)(B)(1) and 40 CFR 761.61(b).

3. **Progress reports and additional information.** Within 10 days after the date of this letter, submit a progress report and final analytical results for soils and ground water tested in the southwest portion of the Site.
4. **USEPA April 1, 2011 conditions of approval.** The conditions of approval in USEPA's April 1, 2011 letter remain in force. The conditions of approval herein are incorporated by reference into USEPA's April 1, 2011 approval of the Notification.

We look forward to being of assistance during ESP's and NRG's implementation of the June 29, 2011 proposed changes to the Notification as modified by USEPA herein. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincerely,



Jeff Scott, Director
Waste Management Division

Enclosures (1)

Cc: Marybeth Hayes, AECOM
Steve Williams, AECOM
Nick LaPorte, NRG Energy, Inc.
Christine Bucklin, DTSC
Henry Jones, LA RWQCB
Steve Armann, USEPA R9
Carmen Santos, USEPA R9